

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

GINA TORRES and DENNIS L. TORRES,)	
)	
Plaintiffs,)	
)	Case No. 4:19-cv-01525-DDN
vs.)	
)	
CITY OF ST. LOUIS, LANCE COATS,)	
GLENNON P. FRIGERIO, JOSHUA D.)	
BECHERER, NICHOLAS J. MANASCO,)	
RONALD ALLEN JR., JOHN C. JONES,)	
MARK S. SEPER, JON B. LONG and)	
TIMOTHY BOYCE,)	
)	
Defendants.)	

PLAINTIFFS' SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES

COME NOW Plaintiffs Gina Torres and Dennis Torres, by and through undersigned counsel, and submit the following supplemental disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, which are in addition to the individuals, documents and information previously disclosed:

Rule 26 (a)(1)(i) Individuals likely to have Discoverable Information Plaintiffs may call

- 1) Anthony Duncan, Architect
4527 Virginia Avenue, St. Louis, MO 63111, (314) 832-3350
To-scale-diagram of 5414 S. Kingshighway
- 2) Amir Brandy, Smith & Associates
Photos of 5414 S. Kingshighway
- 3) Sydwell Hajicek
Videos and photos of 5414 S. Kingshighway
- 4) Martha Ferdinand, William Waller and Shannoon Besch/ Arch City Defenders
Facebook posts and Sasa Chelle video
- 5) Erica Mpoy, criminalist II SLMPD Laboratory
- 6) Julie Davis, criminalist II SLMPD Laboratory
- 7) Charles and Christine Eckenrodt,
5410 S. Kingshighway, St. Louis, MO 63109

Neighbors of Dennis Torres

Rule 26 (a)(1)(ii) Documents in Plaintiffs Possession or Control

- 1) To scale diagram of 5414 S. Kingshighway by Architect Anthony Duncan;
- 2) 72 Photos taken by Amir Brandy;
- 3) Videos and photos taken by Sydwell Hajicek;
- 4) Facebook Video posted by Sasa Chelle;
- 5) Real STL News Facebook posts and press handout from Arch City Defenders (9 pages); and
- 6) 8 Photos from Gina Torres

Rule 26 (a)(1)(iii) Computation of Plaintiffs Damages

Wrongful death damages in the amount of \$10,000,000.00 for the violation of decedent's and plaintiffs civil rights and decedent's pain and suffering and fear and for plaintiffs' loss of the reasonable value of the services, comfort, companionship, instruction, guidance, counsel, training and support of Isaiah M. Hammett by reason of such death, further including past and future lost income, household services and the value of benefits which would have been provided by decedent, and damages sustained by plaintiffs as the result of the wrongful conduct of the defendants, and funeral and cremation expenses of approximately \$20,000.00.

Punitive damages in an amount sufficient to punish and deter these defendants and others similarly situated. Reasonable attorneys' fees and costs of this action in an amount not less than \$75,000.00.

Prejudgment and post judgement interest.

Rule 26 (a)(1)(iv) Insurance

Defendants have not asserted any counterclaims for damages against plaintiffs and, accordingly, there are no applicable insurance policies which might be available to satisfy any judgment against plaintiffs.

DOWD & DOWD, P.C.

By: /s/ Richard K. Dowd
Richard K. Dowd (33383)
Alex R. Lumaghi (56569)
211 N. Broadway, Suite 4050
St. Louis, MO 63102
(314) 621-2500

(314) 621-2503 Facsimile
rdowd@dowdlaw.net
alex@dowdlaw.net
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was sent via email to all counsel of record this 7th day of October, 2020.

Erin K. McGowan
Andrew D. Wheaton
Associate City Counselors
Julian Bush City Counselor
City Hall, Room 314
St. Louis, MO 63103
wheatona@stlouis-mo.gov
mcgowane@stlouis-mo.gov
Attorneys for Defendants

/s/ Richard K. Dowd